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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CAMERON E. OLIVER, Individually and on  
behalf of others similarly situated,

Plaintiff,

vs.

BELL TRANS, a Nevada Corporation, and  
BRENT J. BELL,

Defendants.

CASE NO.: 2:16-cv-00305-JAD-PAL

**JOINT NOTICE OF SETTLEMENT  
AND  
STIPULATION AND ORDER TO  
STAY ALL PROCEEDINGS  
(NINTH REQUEST)**

(Fifth Request Regarding Submission of  
Settlement Documents)

ECF No. 52

Plaintiff Cameron E. Oliver, ("Plaintiff") and Defendants Bell Trans and Brent J. Bell (collectively, "Bell Trans" or "Defendants"), through their counsel of record, submit the below stipulation to extend the stay of all proceedings in the above captioned matter. On June 19, 2017, after being notified that the parties had agreed to settle, on a collective and class-wide basis, all disputes and claims related to this litigation and related litigation ("Related Litigation") (Case No. 2:15-cv-01066-MMDPAL, *Willie Thurmond v. Presidential Limousine*), the Court granted the parties' stipulation to stay this matter until July 27, 2017 in order to allow the parties time to set forth in greater detail the terms of the parties' settlement, as well as to allow Plaintiff's counsel time to file a motion seeking the Court's approval of the settlement terms. ECF No. 45. The Court extended that requested stay pursuant to the parties' further stipulations and orders,

1 the most recent such order continuing the stay of this matter until November 13, 2017. ECF No.  
2 51. The primary reason for the instant extension is to allow the parties to finalize separate  
3 settlement agreements for this matter and the Related Litigation. While the parties had reached  
4 an agreement on all of the necessary substantive terms of a resolution of this case and the  
5 Related Litigation, they had to resolve various unanticipated, and potentially complex,  
6 procedural and mechanical issues regarding how those agreements would be structured and  
7 presented to the Court. To that end, the parties require additional time and respectfully stipulate  
8 as follows:  
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10         The parties agree to stay all proceedings in the above captioned matter for a period of 48  
11 additional days beyond the current stay, which ended on November 13, 2017, to allow for the  
12 preparation and finalization of appropriate settlement documents. As set forth herein, this is the  
13 parties' fifth request to stay this matter for the purpose of memorializing their negotiations into  
14 settlement documents. If this stipulation is granted, the current stay shall be extended until  
15 Tuesday, January 9, 2017.  
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17         The forgoing request for stay is made in good faith not for the purpose of delay.  
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5 Dated: December 5, 2017

6 Respectfully submitted,

7  
8 /s/ Leon Greenberg

9 LEON GREENBERG, ESQ.  
10 DANA SNIEGOCKI, ESQ.  
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12 PROFESSIONAL CORPORATION  
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Attorneys for Plaintiffs

Dated: December 5, 2017

Respectfully submitted,

/s/ Peter Navarro

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Attorneys for Defendants

14 **ORDER**

15 Based on the parties' stipulation [ECF No. 52] and good cause appearing, IT IS  
16 HEREBY ORDERED that the stipulation is approved. The stay is extended  
17 (nunc pro tunc from 11/13/17) to January 9, 2018. If the stipulation and order to  
18 dismiss is not filed by 1/9/18, the parties must appear for a status conference on  
19 1/12/18 at 9:30 a.m. If the stipulation and dismissal order is timely filed, it should  
include the instruction to vacate this status conference.

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22 U.S. District Judge Jennifer Dorsey  
December 7, 2017  
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